PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Federal Express Corporation
6648 West South Perimeter Road
Indianapolis, Indiana 46241

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-11253-00257	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Mona A. Salem, Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: September 13, 2000

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and The Indianapolis Environmental Resources Management Division (ERMD).The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an air courier service.

Responsible Official:	Federal Express Corporation
Source Address:	6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address:	Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Phone Number:	(817)606-4516
SIC Code:	4513
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Twelve (12) generators, consisting of the following:

(1) eight (8) large diesel /jet fuel fired generators, Hub, constructed in 1997, with a maximum capacity of 20,744hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A - ST01H

(2) two (2) emergency diesel /jet fuel fired generators, each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

(3) one (1) emergency diesel /jet fuel fired generator, constructed in 1997, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(4) one (1) diesel /jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05-Hangar generator, exhausting to the atmosphere through stack/vent ST05

(b) Two (2) 31.385 mmBtu per hour natural gas fired Johnston Boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST06A & ST06B

(c) Three (3) storage tanks consisting of the following:

(1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing,

constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vents ST08

(2) one (1) gasoline underground storage tank and gasoline dispensing facility, constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vents ST09

(3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour. Consisting of two (2) 3.5 mmBtu per hour Cleaver-Brooks Boilers and two (2) 6 mmBtu per hour Glycol Boilers.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. Consisting of five (5) 0.03 mmBtu per hour Fire Pump Engines.

(c) Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vents ST07A, & ST07B, & EU07C.

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with integral lids.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, Code of Indianapolis and Marion County Chapter 511, 326 IAC 1-2 , IAPCB Reg. 1-2-2 and 326 IAC 2-7 shall prevail

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f), IC 13-15-5-3 and Code of Indianapolis and Marion County Chapter 511.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) Unless other wise stated, all terms and conditions in this permit, including any provisions designed to limit the sources potential to emit, are enforceable by IDEM.

(b) The IAPCB has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by ERMD using local enforcement procedures.

(c) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

(d) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source’s potential to emit, are enforceable by ERMD using local enforcement procedures.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17 and IAPCB Reg. 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall

contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and ERMD may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and ERMD within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

ERMD
Telephone No.: 317-327-2234 (ask for Data Compliance)
Facsimile No.: 317-327-2274

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, and ERMD may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, and ERMD by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a

determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and ERMD has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and ERMD has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and ERMD determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, and ERMD to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and ERMD at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and ERMD may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and ERMD and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(2) If IDEM, OAM, and ERMD, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and ERMD, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and ERMD, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and ERMD fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 and IAPCB Reg. 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and ERMD in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2] [IAPCB Reg. 2-1-1]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this

permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM and ERMD the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

The Permittee shall not open burn any material except as provided in Chapter 4, Code of Indianapolis and Marion County and IAPCB Reg 4-1. Provisions of the code that are more stringent than 326 IAC 4-1 are locally enforceable only by ERMD.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4] [IAPCB Reg. II-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Reg. II-4. 326 IAC 6-4-2(4) and IAPCB Reg. II-4 is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Enforcement Section, Asbestos Program
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75

cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM and ERMD, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and ERMD, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and ERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and ERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an, annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping

receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any Quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) Twelve (12) generators, consisting of the following:

(a) eight (8) large diesel /jet fuel fired generators, Hub, constructed in 1997, with a maximum capacity of 20,744hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A - ST01H

(b) two (2) emergency diesel /jet fuel fired generators, each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

(c) one (1) emergency diesel /jet fuel fired generator, constructed in 1997, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(d) one (1) diesel /jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05-Hangar generator, exhausting to the atmosphere through stack/vent ST05

(2) Insignificant fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. Consisting of five (5) 0.03 mmBtu per hour diesel /jet fuel fired Fire Pump Engines.

(3) Two (2) 31.385 mmBtu per hour natural gas fired Johnston Boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST06A & ST06B

(4) Insignificant natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour. Consisting of two (2) 3.5 mmBtu per hour Cleaver-Brooks Boilers and two (2) 6 mmBtu per hour Glycol Boilers.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM)[326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions shall be limited as follows:

(a) The **two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers**, shall each be limited to 0.6 pounds per MMBtu heat input.

(b) The **two (2) 31.385 MMBtu per hour Johnston Boilers, identified as EU06**, shall each be limited to 0.44 pounds per MMBtu heat input. This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where:

Pt = pounds of particulate matter emitted per million Btu of heat input (lb/mmBtu)
Q = total source maximum operating capacity in million Btu per hour (mmBtu/hr)

D.1.2 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from each of the **eight (8) large generators, identified as EU01**, shall not exceed five tenths (0.5) pounds per mmBtu heat input.

D.1.3 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05, and EU06 shall be limited to less than 250 tons NOx emissions per 12 month consecutive period, minus the potential emissions from the (5) insignificant fire pump engines and two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers, which is equal to 238.47 tons NOx emissions per 12 month consecutive period or 1,089,912 gallons of diesel/Jet fuel per 12 month consecutive period. For the purposes of determining compliance every one (1) gallon of diesel/Jet fuel shall be equivalent to the following:

(a) Actual amount of diesel/jet fuel used in EU05 shall be adjusted to:
1.378 times the amount of diesel/Jet fuel used for reporting purposes

(b) Actual amount of diesel/jet fuel used in EU06 shall be adjusted to:
228 times the amount of diesel/Jet fuel used for reporting purposes

The above fuel inputs are required to limit the potential to emit of NOx emissions to less than 250 tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-2(Prevention of Significant Deterioration) and 40 CFR 52.21, are not applicable.

D.1.4 Non-Applicability

Pursuant to 326 IAC 2-7-15 (Permit Shield) Condition 3 of the Installation Permit 915303-01, issued May 21,1991 has been replaced with Conditions D.1.1 and D.1.3 and is no longer applicable and therefore no longer federally enforceable.

D.1.5 Non-Applicability

Pursuant to 326 IAC 2-7-15 (Permit Shield) Conditions 8 and 11 of the Construction Permit CP0970257-01, issued July 24,1997 has been replaced with Conditions D.1.2 and D.1.3 and is no longer applicable and therefore no longer federally enforceable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU01and EU05.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or ERMD, compliance with the PM and NOx limits specified in Condition D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 for the **eight (8) large generators, identified as EU01**, shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each of the eight (8) large generators, identified as EU01, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.9 NOx Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total fuel usage for the most recent twelve (12) consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) Pursuant to 326 IAC 12-1 and 40 CFR 60.40, Subpart Dc, records shall be maintained of the amount of fuel combusted during each month for the **two (2) 31.385 million Btu per hour natural gas fired boilers**.

(b) To document compliance with Condition D.1.2, for the **eight (8) large generators, identified as EU01**, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel

supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the diesel/jet fuel and natural gas usage limits and/or the NOx emission limits established in Condition D.1.3

(1) A log of the dates of use; and

(2) The total fuel usage for each month.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 and the Natural Gas Boiler Certification shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Three (3) storage tanks consisting of the following:

(1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing, constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vents ST08

(2) one (1) gasoline underground storage tank and gasoline dispensing facility, constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vents ST09

(3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)] [326 IAC 8-4][326 IAC 12]

D.2.1 General Operation

Any change or modification which may increase the maximum true vapor pressure of the liquid stored in either of the storage tanks listed below:

(a) each of the two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, maintaining a maximum vapor pressure equal to or less than 3.5 kPa, and

(b) the 20,000 gallon diesel storage tank, identified as EU10, maintaining a maximum vapor pressure equal to or less than 15.0 kPa

shall obtain prior approval from the Environmental Resource Management Dision (ERMD) and Office of Air Management (OAM).

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU08 and EU10.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or ERMD, compliance with the limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

(a) Pursuant to 326 IAC 12 and 40 CFR 60.110b and 40 CFR 60.116b (Subpart Kb) and condition D.2.1 storage vessel, identified as EU08 and EU10, shall keep readily accessible records for the life of the source showing:

(1) the dimension of the storage vessel and

(2) an analysis showing the capacity of the storage vessel

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant activity

Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vents ST07A, & ST07B, & EU07C.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Operation

Any change or modification which may increase potential emissions from any of the three (3) paint booths to the following (insignificant limits):

(a) three (3) pounds per hour or fifteen (15) pounds per day of VOC, and

(b) five (5) pounds per day or one (1) ton per year of a single HAP, and

(c) twelve and one half (12.5) pounds per day or two and one half (2.5) tons per year of any combination of HAPs,

shall obtain prior approval from the Environmental Resource Management Division (ERMD) and Office of Air Management (OAM).

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or ERMD, compliance with the limits specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Particulate Matter (PM)

The dry filters shall be in operation at all times when the three (3) paint booths, identified as EU07, are in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with integral lids.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Federal Express Corporation
Source Address: 6702 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Federal Express Corporation
Source Address: 6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
Part 70 Quarterly Report

Source Name: Federal Express Corporation
Source Address: 6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257
Facility: Diesel/jet fuel engines and natural gas boilers
Parameter: Fuel usage
Limit: EU01, EU02, EU03, & EU04 = 1,087,912 gallons of diesel/Jet fuel per 12 month consecutive period for; and/or
EU05 and the five (5) insignificant fire pump engines are adjusted to:
1.378 times diesel/Jet fuel actually used

EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers are adjusted to:
228 times diesel/Jet fuel actually used

YEAR: _____

Month	Column 1	Column 2		Column 3		Column 4 (Column 1 + 2b +3b)	Column 5	Column 4 + Column 5
	EU01, EU02, EU03, & EU04	EU05 and the five (5) insignificant fire pump engines		EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers				
	Column 1	Column 2a	Column 2b	Column 3a	Column 3b	Total monthly usage (gal/mo)	Previous 11 Months	12 Month Total (limit = 1,087,912 gallons)
	usage (gallons per month)	usage (gallons per month)	adjusted to(gal/mo): (multiply by 1,378)	usage (mmcf per month)	adjusted to (gal/mo): (multiply by 228)			
Month 1								
Month 2								
Month 3								

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by:_____ Phone:_____
Title / Position: _____ Signature:_____
Date:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Federal Express Corporation
Source Address: 6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

(can omit boiler affected if only one gas boiler at this plant)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Federal Express Corporation
Source Address: 6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted Quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Environmental Resources Management Division (ERMD) using local enforcement procedures.

(1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
(2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
(3) 326 IAC 1-3-1 through 1-3-4;
(4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
(5) 326 IAC 1-5-1 through 1-5-5;
(6) 326 IAC 1-6-1 through 1-6-6;
(7) 326 IAC 1-7-1 through 1-7-5
(8) 326 IAC 2-3-1 through 2-3-5;
(9) 326 IAC 2-4-1 through 2-4-6;
(10) 326 IAC 2-6-1 through 2-6-4;
(11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
(12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
(13) 326 IAC 2-9-1 through 2-9-14;
(14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language “state or local” immediately after the word “federal” in 326 IAC 2-10-1);
(15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language “federal, state or local” immediately after the word “by” in 326 IAC 2-11-1);
(16) 326 IAC 3-1.1-1 through 3-1.1-5;
(17) 326 IAC 3-2.1-1 through 3-2.1-5;
(18) 326 IAC 3-3-1 through 3-3-5;
(19) 326 IAC 4-2-1 through 4-2-2;
(20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
(21) 326 IAC 7-1.1-1 and 7-1.1-2;
(22) 326 IAC 7-2-1;
(23) 326 IAC 7-3-1 and 7-3-2;
(24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
(25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
(26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
(27) 326 IAC 8-3-1 through 8-3-7;
(28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
(29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
(30) 326 IAC 8-6-1 and 8-6-2;
(31) 326 IAC 9-1-1 and 9-1-2;
(32) 326 IAC 11-1-1 through 11-1-2;
(33) 326 IAC 11-2-1 through 11-2-3;
(34) 326 IAC 11-3-1 through 11-3-6;

(35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

(36) 326 IAC 14-2-1 except 40 CFR 61.145;
(37) 326 IAC 14-3-1;
(38) 326 IAC 14-4-1;
(39) 326 IAC 14-5-1;
(40) 326 IAC 14-6-1;
(41) 326 IAC 14-7-1;
(42) 326 IAC 14-8-1 through 14-8-5;
(43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
(44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that “permitting authority” means the commissioner of IDEM or the administrator of ERMD, whichever is applicable);
(45) 326 IAC 20-2-1;
(46) 326 IAC 20-3-1;
(47) 326 IAC 20-4-1;
(48) 326 IAC 20-5-1;
(49) 326 IAC 20-6-1;
(50) 326 IAC 20-7-1;
(51) 326 IAC 20-8-1;
(52) 326 IAC 20-9-1;
(53) 326 IAC 20-14-1;
(54) 326 IAC 20-15-1;
(55) 326 IAC 20-16-1;
(56) 326 IAC 20-17-1;
(57) 326 IAC 20-18-1;
(58) 326 IAC 20-19-1;
(59) 326 IAC 20-20-1;
(60) 326 IAC 20-21-1;
(61) 326 IAC 21-1-1 (The adoption states that “or the administrator of ERMD” is added in (b));
(62) 326 IAC 22-1-1 (The adoption states that “or the administrator of ERMD” is added in (b)).

Indiana Department of Environmental Management
Office of Air Management and
City of Indianapolis
Environmental Resource Management Division

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Federal Express Corporation**
Source Location: **6648 West South Perimeter Road, Indianapolis, Indiana 46241**
County: **Marion**
SIC Code: **4513**
Operation Permit No.: **T097-11253-00257**
Permit Reviewer: **Monica Dick**

On December 22, 1999, the Office of Air Management (OAM) and Environment Resource Management Division had a notice published in the Indianapolis Star and News, stating that Federal Express Corporation had applied for a Part 70 Operating Permit to operate an air courier service. The notice also stated that OAM and ERMD proposed to issue a permit for this operation and provided information on how the public should review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes, to the draft Title V Permit, will be made. The TSD will remain as it originally appeared when published. OAM and ERMD prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. (underlined language has been added, the language with a line through it has been deleted):

The following comments were made by the source.

Change 1:

The front page of the permit should list the address as follows:

Federal Express Corporation
~~6702~~ 6648 West South Perimeter Road
Indianapolis, Indiana 4625~~-~~41

Change 2:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(c) ~~Three (3)~~ Four (4) storage tanks consisting of the following:

Change 3:

Facility Description [326 IAC 2-7-5(15)] ~~Three (3)~~ Four (4) storage tanks consisting of the following: (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Change 4:

OAM and ERMD have made the following changes:

D.1.10 Record Keeping Requirements

(a) Pursuant to 326 IAC 12-1 and 40 CFR 60.40, Subpart Dc, records shall be maintained of the amount of fuel combusted during each month for the **two (2) 31.385 million Btu per hour natural gas fired boilers**. All records shall be maintained for a period of two years.

Change 5:

Compliance Determination Requirements

~~**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**~~

D.3.4 Particulate Matter (PM)

The dry filters shall be in operation at all times when the three (3) paint booths, identified as EU07, are in operation.

Change 6:

OAM and ERMD would like the TSD Addendum to reflect the correct status of the county. However, the TSD will not be changed.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	~~attainment~~ maintenance
NO_2	attainment
Ozone	~~attainment~~ maintenance
CO	attainment
Lead	attainment

~~(a)~~ Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Change 7:

OAM and ERMD would like the TSD Addendum to reflect the applicability of 40 CFR 63.460. However, the TSD will not be changed.

40 CFR 63, Subpart T does not apply, because Federal Express Corporation does not use any of the solvents listed below, other than wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent, in a batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine.

Solvent regulated under 40 CFR 63, Subpart T:
methylene chloride (CAS No. 75–09–2), perchloroethylene (CAS No. 127–18–4), trichloroethylene (CAS No. 79–01–6), 1,1,1-trichloroethane (CAS No. 71–55–6), carbon tetrachloride (CAS No. 56–23–5) or chloroform (CAS No. 67–66–3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

Change 8:

OAM and ERMD have made the following change to Condition B.11 as part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and ERMD may require to determine the compliance status of the source.

The following comments were received from the source unless otherwise indicated.

Comment 1:

Page five section A..1
Phone Number: ~~901-397-4382~~ (817)606-4516

Source Status: ~~Major~~ Minor Source, Section 112 of the Clean Air Act.

The facility emits less than 10 tons of any single HAP and less than 25 tons of all HAPS. This would

agree with the information contained in the Technical Support Document.

Response 1:

The following changes have been made to the permit:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an ~~stationary~~ air courier service.

Responsible Official:	Federal Express Corporation
Source Address:	~~6702~~ 6648 West South Perimeter Road, Indianapolis, Indiana 46254~~5~~1
Mailing Address:	~~1980 Nonconnah Boulevard, Memphis, Tennessee 38132~~ Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Phone Number:	~~901-397-4382~~ (817)606-4516
SIC Code:	4513
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor, under PSD; ~~Major~~ Minor Source, Section 112 of the Clean Air Act

Comment 2:

Page 5 section A.2(a)(2)

Two (2) emergency diesel/jet fuel fired generators, ~~constructed in 1996~~, each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

Page 5 section A.2(a)(3)

one emergency diesel/jet fuel fired generator, constructed in ~~1998~~ 1997,

Page 6 section A.2 (c)(3)

one (1) diesel/jet fuel tank and dispensing facility, constructed in ~~1986~~ 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

Response 2:

The following changes have been made to the permit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Twelve (12) generators, consisting of the following:

(2) two (2) emergency diesel /jet fuel fired generators, ~~constructed in 1996,~~ each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator,

constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

(3) one (1) emergency diesel /jet fuel fired generator, constructed in ~~1998~~ 1997, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(c) Three (3) storage tanks consisting of the following:

(3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in ~~1986~~ 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

Comment 3:

page 6 section A.3(c)
~~two(2)~~ three (3) Binks paint booths, utilizing low pressure atomization paint guns, constructed in 1991, identified as EU07, with a maximum capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vent ST07A, ST07B, and ST07C.

Response 3:

The following changes have been made to the permit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(c) ~~Two (2)~~ Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vents ST07A, ~~&~~ ST07B, & EU07C.

Comment 4:

Can FedEx fully comply with the opacity requirements of this section by meeting the terms of Compliance Requirement (a), listed on page 13 of the Technical Support Document?

Response 4:

Opacity [326 IAC 5-1] is applicable to the facility or source. However, General Record Keeping Requirements listed under [326 IAC 2-7-5(3)][326 IAC 2-7-6] are only applicable to required monitoring data and support information. Therefore, the only records that must be maintained would be listed in the D sections of the permit.

The diesel /jet fuel generators, engines & natural gas fired boilers do not have a compliance monitoring component in their D section. The Compliance Requirement section of the TSD should not have been incorporated. FedEx Corporation will be expected to maintain a 30% or less opacity as stated in 326 IAC 5-1-2. However, are not expected to follow the Compliance Monitoring Requirements as specified in the TSD.

Comment 5:

Page 30 section D.1(1)(b)

The facility description should be modified as follows:

Two (2) emergency diesel/jet fuel fired generators, ~~constructed in 1996~~, each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

and

page 30 section D.1(1)(c)

one emergency diesel/jet fuel fired generator, constructed in ~~1998~~ 1997,

Response 5:

The following changes have been made to the permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) Twelve (12) generators, consisting of the following:

(b) two (2) emergency diesel /jet fuel fired generators, ~~constructed in 1996,~~ each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03

(c) one (1) emergency diesel /jet fuel fired generator, constructed in ~~1998~~ 1997, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 6:

Page 31 section D.1.1

Typographical error in equation for Q, million Bru per hour should read million Btu per hour

Response 6:

The following change has been made to the permit.

D.1.1 Particulate Matter (PM)[326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions shall be limited as follows:

(a) The **two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers**, shall each be limited to 0.6 pounds per MMBtu heat input.

(b) The **two (2) 31.385 MMBtu per hour Johnston Boilers, identified as EU06**, shall each be limited to 0.44 pounds per MMBtu heat input. This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu of heat input (lb/mmBtu)

Q = total source maximum operating capacity in million ~~Bru~~ Btu per hour (mmBtu/hr)

Comment 7:

page 31 section D.1.3(a) and (b)

The emission factor for EU01 is 3.2 lb NOx/MMBtu and the emission factor for EU05 is 4.41 lb NOx/MMBtu . Thus, burning one gallon of diesel in EU05 is equivalent to burning 1.378 gallons of diesel in EU01.

The emission factor for EU01 is 0.4383 lb NOx/gall diesel burned (3.2 lb NOx/MMBtu * 0.137 MMBtu/gallon of diesel). The emission factor for EU06 is 100 lb NOx/MMCF. Thus, the NOx emissions from burning 1 MMSCF of natural gas are equivalent to burning 228 gallons of diesel in EU01.

Response 7:

ERMD agrees, the changes are as follows:

D.1.3 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05, and EU06 shall be limited to less than 250 tons NOx emissions per 12 month consecutive period, minus the potential emissions from the (5) insignificant fire pump engines and two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers, which is equal to 238.47 tons NOx emissions per 12 month consecutive period or ~~1,087,641~~ 1,089,912 gallons of diesel/Jet fuel per 12 month consecutive period. For the purposes of determining compliance every one (1) gallon of diesel/Jet fuel shall be equivalent to the following:

~~(a) EU05 shall be adjusted to:~~
~~0.73 percent for diesel/Jet fuel used in EU01, EU02, EU03, and EU04~~

~~(b) EU06 shall be adjusted to:~~
~~4176 million cubic foot of natural gas per gallon of diesel/Jet fuel used in EU01, EU02, EU03, and EU04~~

(a) Actual amount of diesel/jet fuel used in EU05 shall be adjusted to:
1.378 times the amount of diesel/Jet fuel used for reporting purposes

(b) Actual amount of diesel/jet fuel used in EU06 shall be adjusted to:
228 times the amount of diesel/Jet fuel used for reporting purposes

The above fuel inputs are required to limit the potential to emit of NOx emissions to less than 250 tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-2(Prevention of Significant Deterioration) and 40 CFR 52.21, are not applicable.

Comment 8:

page 32 section D.1.11

This section should be renumbered as D.1.10, to maintain consistency.

page 32 section D.1.11(a)

FedEx requests that fuel usage for these boilers be tracked on a monthly rather than daily basis. This can be accomplished with approval from the EPA regional office and it is our experience that this alternative recordkeeping requirement is routinely approved for natural gas boilers. Fuel consumption in

these two boilers is consistently so low that reportable emissions have been zero for the last two years. In light of this low usage, it seems that daily fuel logs are an unnecessary recordkeeping burden

The requirement states that all records must be kept for two years, but elsewhere it is stated that all records pertaining to this permit must be kept consistent throughout the permit.

page 32 section D.1.11(c) to document compliance with the Conditions of D.1.3,

Response 8:

ERMD accepts your analogy on natural gas boilers and has moved record keeping requirements from daily to monthly monitoring. As far as the condition being confusing as it pertains to record keeping, ERMD has deleted the two year period in D.1.10(a).

As regards to the comment concerning records retention, all records shall be maintained in accordance with Section C - General Record Keeping Requirements, is the overriding requirement. Compliance with D.1.10(d) assures compliance with 40 CFR 60.40, Subpart Dc.

D.1.1~~1~~0 Record Keeping Requirements

(a) Pursuant to 40 CFR 60.40, Subpart Dc, records shall be maintained of the amount of fuel combusted during each ~~day~~ month for the **two (2) 31.385 million Btu per hour natural gas fired boilers**. ~~All records shall be maintained for a period of two years~~.

(c) To document compliance with Condition~~s~~ D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the diesel/jet fuel and natural gas usage limits and/or the NOx emission limits established in Condition D

Comment 9:

page 33 section D.1.12 this section should be renumbered as D.1.11, to maintain consistency.

page 33 section D.1.12 this condition is confusing because it specifies that a “Quarterly Summary” be submitted “after the end of the six (6) month period being reported.” Please rewrite this condition to clarify whether reports are due quarterly or semiannually.

Response 9:

The condition has been changed as follows:

D.1.1~~2~~1 Reporting Requirements

A ~~Q~~ quarterly summary of the information to document compliance with Condition D.1.3 and ~~T~~ the Natural Gas Boiler Certification shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the ~~six (6) month period~~ quarter being reported.

Comment 10:

page 34 section D.2(3)

one (1) diesel/jet fuel tank and dispensing facility, constucted in ~~1986~~ 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

Response 10:

The condition has been changed as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in ~~1986~~ 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10 (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 11:

Page 34 - 35 section D.2.3(a)(3)

The record retention period for the true vapor pressure of the liquid stored in the vessel should be reduced from the life of the storage vessel to five years (Title V permit tern). True vapor pressure is not specifically required in NSPS Subpart Kb as information that must be kept for the tank lifetime.

Response 11:

ERMD has made the following changes to more correctly match the NSPS and intent of the condition.

In addition to the comment from FedEx, ERMD has made changes to condition D.2.1, to further clarify the affect maximum vapor pressure has on the applicability of 40 CFR 60.110, Subpart Kb. Condition D.2.2 has been added. D.2.2 applies because a NSPS applies and therefore a Preventative Maintenance Plan is required. The conditions that follow were subsequently renumbered.

In addition,a Preventative Maintenance Plan (PMP) should have been listed in the permit for the two storage tanks identified as EU08 and the one storage tank identified as EU10. The criteria for requiring a PMP are as follows:

1. a NSPS or NESHAP applies; or
2. the unit has a control device and allowable emissions exceed 10 lb/hr; or
3. the unit does not have controls and actual emissions exceed 25 tons per year; or
4. the unit would have been subject to an applicable requirement if there was not a condition limiting the PTE.

D.2.1 ~~Maximum vapor pressure limit~~ General Operation

~~The maximum true vapor pressure of the liquid shall be as follows~~: Any change or modification which may increase the maximum true vapor pressure of the liquid stored in either of the storage

tanks listed below:

(a) each of the two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, ~~shall not exceed~~ maintaining a maximum vapor pressure equal to or less than 3.5 kPa, and

(b) the 20,000 gallon diesel storage tank, identified as EU10, ~~shall not exceed~~ maintaining a maximum vapor pressure equal to or less than 15.0 kPa

~~These limits will assure compliance with the proper monitoring requirements specified in 326 IAC 12 and 40 CFR 60, Subpart Kb~~ shall obtain prior approval from the Environmental Resource Management Dision (ERMD) and Office of Air Management (OAM).

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU08and EU10.

D.2.~~3~~4 Record Keeping Requirements

(a) Pursuant to 326 IAC 12 and 40 CFR 60.110b and 40 CFR 60.116b (Subpart Kb) and condition D.2.1 storage vessel, identified as EU08 and EU10, shall keep readily accessible records for the life of the source showing:

(1) the dimension of the storage vessel ~~;~~ and

(2) an analysis showing the capacity of the storage vessel. ~~; and~~

~~(3) the true vapor pressure of the liquid stored in the vessel.~~

Comment 12:

page 6 section A.3(c)
~~two(2)~~ three (3) Binks paint booths, utilizing low pressure atomization paint guns, constructed in 1991, identified as EU07, with a maximum capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vent ST07A, ST07B, and ST07C.

Response 12:

The permit has been changed as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant activity

~~Two (2)~~ Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vents ST07A, ~~&~~ ST07B, & EU07C.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 13:

page 36 section D.3.1

Any change or modification which may increase potential emissions from either of the three (3) paint booths to the following (insignificant limits)

Response 13:

The condition has been changed as follows:

D.3.1 General Operation

Any change or modification which may increase potential emissions from ~~either~~ any of the ~~two (2)~~ three (3) paint booths to the following (insignificant limits):

Comment 14:

page 36 section D.3.4

The dry filters shall be in operation at all times when the three (3) paint booths, identified as EU07, are in operation.

Response 14:

The condition has been changed as follows:

D.3.4 Particulate Matter (PM)

The dry filters shall be in operation at all times when the ~~two (2)~~ three (3) paint booths, identified as EU07, are in operation.

Comment 15:

page 37 section D.4

The degreasers used by FedEx are equipped with remote reservoirs and therefore are not subject to the requirements of 326 IAC 8-3-5.

Response 15:

ERMD agrees, given the existence of remote reservoirs, 326 IAC 8-3-5 does not apply. The condition has been deleted.

~~D.4.2 Volatile Organic Compounds (VOC)~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{o}C) (one hundred degrees~~

~~Fahrenheit (100°F));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases~~.

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

Comment 16:

Page 39, 40, 42, 43, & 44

Source Address: 6702 West South Perimeter Road, Indianapolis, Indiana 46251
Mailing Address: Attn: Larry Wingo
2001 World Wide Drive-Alliance Airport
Fort Worth, Texas 76177

Response 16:

Page 39, 40, 42, 43, & 44 have been changed as follows:

Source Name: Federal Express Corporation
Source Address: ~~3502 South High School Road~~ 6648 West South Perimeter Road, Indianapolis, Indiana 46241
Mailing Address: ~~3502 South High School Road, Indianapolis, Indiana 46241~~Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
Part 70 Permit No.: T097-11253-00257

Comment 17:

Page 42

This page should be revised to reflect the requirements of section D.1.3. All references to the five fire pumps, the two Cleaver-Brooks boilers, and the two glycol boilers should be removed, from both the text description of the "Limit" and the calculation table (columns 2 and 3).

adjusted to (gal/month): (~~multiply~~ divide by 0.73) or multiply by ~~0.73~~ 1.378)

adjust to (gal/mo): (~~divide by 4176~~ multiply by 228)

Response 17:

Page 42 has been changed as follows:

Limit: **EU01, EU02, EU03, & EU04 = ~~1,138,800~~ 1,087,912 gallons** of diesel/Jet fuel per 12 month consecutive period ~~for~~; and/or
EU05 and the five (5) insignificant fire pump engines are adjusted to:

1.378 ~~0.73~~	~~percent for gallons of diesel/Jet fuel used in EU05 is equal to one gallon~~ times	diesel/Jet fuel actually used ~~in EU01, EU02, EU03, and EU04~~

EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers are adjusted to:

228 ~~4176~~	~~percent of million cubic foot of natural gas per gallon of~~ times	diesel/Jet fuel actually used ~~in EU01, EU02, EU03, and EU04~~

YEAR: _____

Month	Column 1	Column 2		Column 3		Column 4 (Column 1 + 2b +3b)	Column 5	Column 4 + Column 5
	EU01, EU02, EU03, & EU04	EU05 and the five (5) insignificant fire pump engines		EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers				
	Column 1	Column 2a	Column 2b	Column 3a	Column 3b	Total monthly usage (gal/mo)	Previous 11 Months	12 Month Total (limit = ~~1,138,800~~ 1,087,912 gallons)
	usage (gallons per month)	usage (gallons per month)	adjusted to(gal/mo): (multiply by ~~adjustment~~ 1.378 ~~0.73~~)	usage (mmcf per month)	adjusted to (gal/mo): (~~divide~~ multiply by ~~adjustment~~ ~~4176~~ 228)			
Month 1								
Month 2								
Month 3								

The TSD will not change however the following mistakes were found in the TSD. The TSD should have read as follows:

Page 1

Source Background and Description

Source Name: Federal Express Corporation
Source Address: ~~6702~~ 6648 West South Perimeter Road, Indianapolis, Indiana 462~~5~~41
Mailing Address: ~~1980 Nonconnah Boulevard, Memphis, Tennessee 38132~~
Attn: Larry Wingo, 2001 World Wide Drive-Alliance Airport, Fort Worth, Texas 76177
County: Marion
SIC Code: 4513
Operation Permit No.: T097-11253-00257
Permit Reviewer: Monica Dick

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Federal Express relating to the operation of a ~~stationary~~ air courier service.

Permitted Emission Units and Pollution Control Equipment

(a) Twelve (12) generators, consisting of the following:

(2) two (2) emergency diesel /jet fuel fired generators, ~~constructed in 1996,~~ each with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator constructed in 1996, and EU03-Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and

ST03

(3) one (1) emergency diesel /jet fuel fired generator, constructed in ~~1998~~ 1997, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(c) ~~Three (3)~~ Four (4) storage tanks consisting of the following:

Page 2

(3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in ~~1986~~ 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

Insignificant Activities

(c) ~~Two (2)~~ Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled dry filters, exhausting to the atmosphere through stack/vents ST07A, ~~&~~ ST07B, & EU07C.

Page 8, 9, & 10

Particulate Matter (PM)

Controlling pollutant limit:
228 ~~4176~~ million cubic foot of natural gas per gallon of diesel/Jet fuel used (~~1,138,800~~ 1,087,912 gal/yr limit) in EU01, EU02, EU03, and EU04

Compliance Calculation at Maximum:
4769 ~~4176~~ mmcf/yr = ~~X 1,138,800~~ 1,087,912 gal/year, which is the maximum under the synthetic limit ~~= 4,755.6288mmcf/yr~~
~~4,755.6288~~ 4769 mmcf/yr X 1.9 lb/mmcf X yr/8760hr = 0.103 ~~**1.03**~~**lb/hr**

Since the maximum fuel usage limit, for the control pollutant, allows for a potential of no more than ~~1.03~~ 0.103 lb/hour PM, then EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers calculate in compliance with 326 IAC 6-2-4.

Sulfur Dioxide (SO_2) [326 IAC 7-1.1-2]

Calculation of compliance:
Controlling pollutant (NOx) Limit for each of the (8) large diesel /jet fuel fired generators or combined = ~~1,087,641~~ 1,087,912 gal/yr X 0.137mmBtu/gal = ~~149,006.82~~ 149,044 mmBtu/yr
~~149,006.82~~ 149,044 mmBtu/yr X 1.01 lb SO2/mmBtu X 0.5 Sulfur Content = ~~75,248.44~~ 75,267 lb/yr SO2 emissions

Since the potential SO2 emissions, after the controlling pollutant (NOx) limit, is ~~75,248.44~~ 75,267 lb/yr and the allowable SO2 emissions is 78,0840lb/yr, the (8) diesel /jet fuel fired generators are in compliance with 326 IAC 7-1.1-1. Note: The sulfur content of the No.2 fuel oil is five tenths percent (0.5%). Compliance with the SO2 limit under 326 IAC 7-1.1-1 is dependent on the sulfur content and is subject to 326 IAC 3-7-4 (Fuel oil sampling; analysis methods).

Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05, and EU06 shall be limited to less than 250 tons Nox emissions per 12 month consecutive period, minus the potential emissions from the (5) insignificant fire pump engines and two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers, which is equal to 238.47 tons Nox emissions per 12 month consecutive period or~~1,087,641~~ 1,087,912 gallons of diesel/Jet fuel per 12 month consecutive period. For the purposes of determining compliance every one (1) gallon of diesel/Jet fuel shall be equivalent to the following:

(a) EU05 shall be adjusted to:
1.378 ~~0.73~~ percent of ~~for gallons of diesel/Jet fuel used in EU05 is equal to one gallon~~ diesel/Jet fuel used in EU01, EU02, EU03, and EU04

(b) EU06 shall be adjusted to:
228 ~~4176~~ percent of ~~million cubic foot of natural gas per gallon of~~ diesel/Jet fuel used in EU01, EU02, EU03, and EU04

The above fuel inputs are required to limit the potential to emit of NOx emissions to less than 250 tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-2(Prevention of Significant Deterioration) and 40 CFR 52.21, are not applicable.

The PSD limit and equivalency limits were established as follows:

Limit:
250 ton Nox per year - (3.03t/y + 8.5t/y)* = 238.47 ton per year
~~238.47 t/yr NOx * 2000 lb/t * yr/8760hr = 54.45 lb/hr NOx~~
0.137 mmBtu/gal = heat value, Diesel AP-42 Appendix A, page A-5
Large generators = 3.2 lb/mmBtu Emission Factor
238.47t/yr * mmBtu/3.2lb * 2000lb/t = 149,044mmBtu/yr (heat input from diesel/jet A)
149,044mmBtu/yr (heat input from diesel/jet A) * gal/0.137mmBtu = **1,087,912gal/yr**
~~54.45 lb/hr = 3.2 lb/mmBtu * X mmBtu/hr~~
~~54.45 lb/hr * mmBtu/3.2 lb = 17.01 mmBtu/hr~~
~~17.01 mmBtu/hr * gal/0.137mmBtu = 124.16 gal/hr~~
~~124.16 gal/hr * 8760 hr/yr = **1,087,641gal/yr**(rounded to the nearest whole number) = 238.47 TPY Nox~~
*Potential emissions from insignificant boilers and engines.

EU05 Equivalency:
Small Generators = 4.41 lb/mmBtu Emission Factor
238.47t/yr * mmBtu/4.41 lb * 2000lb/t = 108,150 mmBtu/yr (heat input)
108,150 mmBtu/yr (heat input) * gal/0.137mmBtu = 789,416gal/hr
1,087,912gal/yr(heat input EU01, EU02, EU03, and EU04) * hr/789,416gal(heat input EU05) =
1.378 percent
~~54.45 lb/hr = 4.41 lb/mmBtu * X mmBtu/hr~~
~~54.45 lb/hr * mmBtu/4.41 lb = 12.35 mmBtu/hr~~
~~12.35 mmBtu/hr * mmBtu/0.137 gal = 90.15 gal/hr~~
~~If 124.16 gal/hr diesel/jet fuel in large generators = 238.47 TPY NOx &~~
~~90.15 gal/hr diesel/jet fuel in small generators= 238.47 TPY NOx, then~~
~~90.15 gal/hr * hr/124.16 gal = 0.73 percent~~

EU06 Equivalency:
Natural gas boiler = 100 lb/mmcf Emission Factor
238.47 t/yr(potential emissions) * mmcf/100lb(Nox EF) * 2000lb/t = 4769 mmcf/yr(potential throughput)
1,087,912gal/yr(heat input EU01, EU02, EU03, and EU04) * yr/ 4769 mmcf(potential throughput)= **228**

percent
~~Btu/1050 cf = heat value, natural gas AP-42 Appendix A, page A-5~~
~~54.45 lb/hr = 100lb /mmcf * X mmBtu/hr * mmcf/1000 mmBtu~~
~~54.45 lb/hr * mmcf/100 lb * 1000 mmBtu/mmcf = 544.5 mmBtu/hr~~
~~544.5 mmBtu/hr * mmcf/0.00105 mmBtu = 518,571 mmcf/hr(rounded to the nearest whole number)~~
~~If 124.16 gal/hr diesel/jet fuel = 238.47 TPY NOx &~~
~~518,571 mmcf/hr natural gas = 238.47 TPY NOx, then~~
~~518,571 mmcf/hr * hr/124.16 gal = 4176 mmcf natural gas per 1 gallon diesel/jet fuel~~

page 12 & 13

~~Compliance Requirements~~

~~Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.~~

~~Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.~~

~~The compliance monitoring requirements applicable to this source are as follows:~~

~~Diesel /jet fuel generators, engines & natural gas fired boilers have applicable Compliance Monitoring Conditions as listed below:~~

~~(a) Visible emission notations of the stack exhaust, when burning diesel or Jet A fuel, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions~~.

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency~~

~~and response steps for when an abnormal emission is observed.~~

Appendix A:

The addresses listed on the spreadsheets should have read as follows:

Company Name: **Federal Express Corporation**
Address City IN Zip: ~~**3502 South High School Road, Indianapolis, Indiana 46251**~~
6648 West South Perimeter Road, Indianapolis, Indiana 46241
TV Permit #: **T097-11253-00257**
Reviewer: **Monica Dick**
Date: **07/29/99**

Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resource Management Division

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Federal Express Corporation
Source Address: 6702 West South Perimeter Road, Indianapolis, Indiana 46251
Mailing Address: 1980 Nonconnah Boulevard, Memphis, Tennessee 38132
County: Marion
SIC Code: 4513
Operation Permit No.: T097-11253-00257
Permit Reviewer: Monica Dick

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Federal Express relating to the operation of a stationary air courier service.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Twelve (12) generators, consisting of the following:

(1) eight (8) diesel /jet fuel fired generators, Hub, constructed in 1997, with a total maximum capacity of 20,744hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A - ST01H

(2) two (2) emergency diesel /jet fuel fired generators, constructed in 1996, with a maximum capacity of 600 kW, identified as EU02-Matrix Building generator and EU03-Truck Unloading Area generator, exhausting to the atmosphere through stack/vent ST02 and ST03

(3) one (1) emergency diesel /jet fuel fired generator, constructed in 1998, with a maximum capacity of 500 kW, identified as EU04-GSE Building generator, exhausting to the atmosphere through stack/vent ST04

(4) one (1) diesel /jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05-Hangar generator, exhausting to the atmosphere through stack/vent ST05

(b) Two (2) 31.385 MMBtu per hour natural gas fired Johnston Boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST06A & ST06B

(c) Three (3) storage tanks consisting of the following:

(1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing, constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vents ST08

(2) one (1) gasoline underground storage tank and gasoline dispensing facility,

constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vents ST09

(3) one (1) diesel/ jet fuel tank and dispensing facility, constructed in 1986, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vents ST10

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour. Consisting of two (2) 3.5 mmBtu per hour Cleaver-Brooks Boilers and two (2) 6 mmBtu per hour Glycol Boilers.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. Consisting of five (5) 0.03 mmBtu per hour diesel /jet fuel fired Fire Pump Engines.

(c) Two (2) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a max capacity of 150 gallons of coating per year, controlled by dry filters, exhausting to the atmosphere through stack/vents ST07A & ST07B

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with integral lids.

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids

(f) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Closed loop heating and cooling systems.

(i) Paved and unpaved roads and parking lots with public access.

(j) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from activities would not be associated with any production process.

(k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(m) On-site fire and emergency response training approved by the department.

(n) Stationary fire pumps for emergencies.

(o) Other activities or catagories not previously identified:

(1) two (2) 10,000 gallon underground diesel tanks

(2) four (4) fuel carts: two (2) diesel and two (2) gasoline

(3) Emergency generator and fire pump fuel oil tanks

(4) deicing operations

(5) propylene glycol storage and handling

(6) Hand-wipe (with degreasing substances) operations

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Construction Permit CP-0970257-01, issued July 24, 1997; and

(b) Installation Permit 915303-01, issued May 21, 1991

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) CP-0970257-01, issued July 24, 1997

Condition 8: PSD Minor Source Limit - That fuel usage (distillate oil #2) shall be limited to 32,096 gallons per month. This production limitation is equivalent to Nitrogen Oxide (NOx) emissions of 20.75 tons per month or 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Reason not incorporated: The hp to mmBtu conversion factor used (AP-42 Appendix A) were not associated with the emission factors used (table 3.3-2). A separate conversion factor of lb/hp-hr = 7,000 mmBtu/hp-hr is listed with the emission factors from table 3.3-2 of AP-42. This conversion factor was used in the Title V permit and therefore provided a different usage limit.

(b) CP-0970257-01, issued July 24, 1997

Condition 11: Particulate Matter Limitation - That pursuant to Indianapolis APCB Regulation II-2(A)(1)(a), particulate matter (PM) emissions from the eight (8) emergency backup generators shall be limited to 0.6 lb/MMBtu.

Reason not incorporated: The rule cited is in the process of being repealed. 326 IAC Article 6 State rules will be adopted by the Indianapolis Pollution Control Board. The diesel/jet fuel fired generators and engines should be regulated by 326 IAC 6-3-2 (Process Operations).

(c) Installation Permit 915303-01, issued May 21, 1991

Allowable Emissions:

TSP	0.17	lbs/hr	0.76	Tons/Yr
SO2	0.31	lbs/hr	1.37	Tons/Yr
CO	1.21	lbs/hr	5.29	Tons/Yr
NOx	4.83	lbs/hr	21.15	Tons/Yr
VOC	0.10	lbs/hr	0.42	Tons/Yr

Condition 3: Allowable Emissions - The Permittee shall not release emissions in excess of the amounts shown above.

Reason not incorporated: This condition limited the companies emissions therefore, meeting the requirements of a "small source" category. Based on current rules and regulations the past limit which allowed the source to remain a "small source" is no longer valid.

Enforcement Issue

(a) IDEM and ERMD are aware that Part 70 Title application was submitted after the submission deadline.

(b) IDEM and ERMD are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on February 12, 1999.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 11.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	67.35
PM-10	42.15
SO_2	326.09
VOC	62.71
CO	582.67
NO_x	2123.41

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hexane	.10
Butyl Acetate	.24
MIBK	.21
MAK	.23
Toluene	.02
Titanium Dioxide	.63
Xylene	.22
TOTAL	1.65

All potential emissions were derived from the calculations found in Appendix A.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, SO2, CO, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
EU01/ eight 2593hp generators	--	--	0.5 lb/ mmBtu ea.	--	--		--
EU02 & EU03	--	--	--	--	--		--
EU04	--	--	--	--	--		--
EU05	--	--	--	--	--		--
insig. engines	--	--	--	--	--		--
EU06 two 31.385 mmBtu boilers	0.44 lb/ mmBtu ea.	0.44 lb/ mmBtu ea.	--	--	--		--
insig. nat. gas boilers	0.6 lb/ mmBtu ea.	0.6 lb/ mmBtu ea.	--	--	--		--
Total Emissions	--	--	--	--	--	Less than 250 TPY	--

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The two (2) natural gas fired boilers are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60., Subpart Dc), due to the date of construction (1987). Since both boilers are natural gas fired, this rule only requires record keeping.

(b) EU08 and EU10 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b(a) & (b) and 60.116b(a) & (b), Subpart Kb), because the storage vessel contains volatile organic liquid (petroleum liquid) for which construction commenced after July 23, 1984 and the capacity is greater than 40 cubic meters. This rule requires

the record keeping only for storage vessels either with a capacity greater than or equal to 151m^3 storing a liquid with a maximum true vapor pressure less than 3.5 kPa or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This is a minor source, because the total source potential to emit of the controlling pollutant, Nitrogen Oxides (NOx), is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of (NOx). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Diesel /jet fuel generators, engines & natural gas fired boilers

Particulate Matter Limit For Engines

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

Since EU01, EU02, EU03, EU04, EU05, and the five (5) insignificant fire pump engines are not indirect heating sources, then 326 IAC 6-2-1 does not apply.

Since the generators are incorporated within the definition of "process operation" and are not exempt from this rule or limited by any 326 IAC 6-1, 12, or 2-7-24, then 326 IAC 6-3-2(c) applies. However, limits are based on “process weight rate”, under 326 IAC 1-2-59(a) “Process weight; weight rate” liquid and gaseous fuels will not be considered as part of the process weight. Therefore EU01, EU02, EU03, EU04, EU05, and the five (5) insignificant fire pump engines are not currently regulated by any PM limit under 326 IAC.

Particulate Matter limit Boilers

Since EU06 and the two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers are an indirect heating source constructed after September 21, 1983, 326 IAC 6-2-4 applies. Since the two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers are less than 10 mmBtu per hour, then pounds of particulate matter emitted per million Btu (lb/mmBtu)

heat input shall not exceed 0.6.

Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions shall be limited as follows:

(a) each of the two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers, shall each be limited to 0.6 pounds per MMBtu heat input.

(b) The two (2) 31.385 MMBtu per hour Johnston Boilers, identified as EU06, shall each be limited to 0.44 pounds per MMBtu heat input. This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu of heat input (lb/mmBtu)
Q = total source maximum operating capacity in million Bru per hour (mmBtu/hr)

Limits:
0.44 lb/mmBtu X 62.8 mmBtu/hr = **27.632 lb/hr**
0.6 lb/mmBtu X 19.0 mmBtu/hr = **11.4 lb/hr**

Controlling pollutant limit:
4176 million cubic foot of natural gas per gallon of diesel/Jet fuel used (1,138,800gal/yr limit) in EU01, EU02, EU03, and EU04

Compliance Calculation at Maximum:
4176mmcf/gal X 1,138,800gal/year = 4,755.6288mmcf/yr
4,755.6288 mmcf/yr X 1.9 lb/mmcf X yr/8760hr = **1.03lb/hr**

Since the maximum fuel usage limit, for the control pollutant, allows for a potential of no more than 1.03 lb/hour PM, then EU06, the two (2) insignificant Cleaver-Brooks Boilers, and two (2) insignificant Glycol Boilers calculate in compliance with 326 IAC 6-2-4.

Sulfur Dioxide (SO_2)

Since EU01 is comprised of 8 facilities each of which have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide, then 326 IAC 7-1.1-1 applies. Since 326 IAC 7-4 does not apply because the facilities are not located in Lake County 326 IAC 7-1.1-2(a)(3) applies for the combustion of distillate oil. None of the other generators, engines, or boilers at the source have the ability to emit 25 tons per year or 10 pounds per hour therefore only EU01 is limited by 326 IAC 7-1.1-1.

Sulfur Dioxide (SO_2) [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from each of the eight (8) diesel /jet fuel fired generators, identified as EU01, shall not exceed five tenths (0.5) pounds per MMBtu heat input.

SO2 emissions limit:
yearly max capacity = 18 mmBtu/hr X 8760 hr/yr = 157,680 mmBtu/yr
0.5lb/mmBtu X 157,680mmBtu/yr = 78,0840lb/yr

Calculation of compliance:
Controlling pollutant (NOx) Limit for each of the (8) large diesel /jet fuel fired generators or combined = 1,087,641gal/yr X 0.137mmBtu/gal = 149,006.82 mmBtu/yr
149,006.82 mmBtu/yr X 1.01 lb SO2/mmBtu X 0.5 Sulfur Content = 75,248.44 lb/yr SO2

emissions

Since the potential SO2 emissions, after the controlling pollutant (NOx) limit, is 75,248.44 lb/yr and the allowable SO2 emissions is 78,0840lb/yr, the (8) diesel /jet fuel fired generators are in compliance with 326 IAC 7-1.1-1. Note: The sulfur content of the No.2 fuel oil is five tenths percent (0.5%). Compliance with the SO2 limit under 326 IAC 7-1.1-1 is dependent on the sulfur content and is subject to 326 IAC 3-7-4 (Fuel oil sampling; analysis methods).

Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05, and EU06 shall be limited to less than 250 tons Nox emissions per 12 month consecutive period, minus the potential emissions from the (5) insignificant fire pump engines and two (2) insignificant Cleaver-Brooks and two (2) insignificant Glycol Boilers, which is equal to 238.47 tons Nox emissions per 12 month consecutive period or 1,087,641 gallons of diesel/Jet fuel per 12 month consecutive period. For the purposes of determining compliance every one (1) gallon of diesel/Jet fuel shall be equivalent to the following:

(a) EU05 shall be adjusted to:
0.73 percent for diesel/Jet fuel used in EU01, EU02, EU03, and EU04

(b) EU06 shall be adjusted to:
4176 million cubic foot of natural gas per gallon of diesel/Jet fuel used in EU01, EU02, EU03, and EU04

The above fuel inputs are required to limit the potential to emit of NOx emissions to less than 250 tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-2(Prevention of Significant Deterioration) and 40 CFR 52.21, are not applicable.

The PSD limit and equivalency limits were established as follows:

Limit:
250 ton Nox per year - (3.03t/y + 8.5t/y)* = 238.47 ton per year
238.47 t/yr NOx * 2000 lb/t * yr/8760hr = 54.45 lb/hr NOx
0.137 mmBtu/gal = heat value, Diesel AP-42 Appendix A, page A-5
Large generators = 3.2 lb/mmBtu Emission Factor

54.45 lb/hr = 3.2 lb/mmBtu * X mmBtu/hr
54.45 lb/hr * mmBtu/3.2 lb = 17.01 mmBtu/hr
17.01 mmBtu/hr * gal/0.137mmBtu = 124.16 gal/hr
124.16 gal/hr * 8760 hr/yr = **1,087,641gal/yr**(rounded to the nearest whole number) = 238.47 TPY Nox
*Potential emissions from insignificant boilers and engines.

Equivalency:

Small Generators = 4.41 lb/mmBtu Emission Factor

54.45 lb/hr = 4.41 lb/mmBtu * X mmBtu/hr
54.45 lb/hr * mmBtu/4.41 lb = 12.35 mmBtu/hr
12.35 mmBtu/hr * mmBtu/0.137 gal = 90.15 gal/hr
If 124.16 gal/hr diesel/jet fuel in large generators = 238.47 TPY NOx &
90.15 gal/hr diesel/jet fuel in small generators= 238.47 TPY NOx, then
90.15 gal/hr * hr/124.16 gal = 0.73 percent

Natural gas boiler = 100 lb/mmcf Emission Factor

Btu/1050 cf = heat value, natural gas AP-42 Appendix A, page A-5

54.45 lb/hr = 100 lb/mmcf * X mmBtu/hr * mmcf/1000 mmBtu

54.45 lb/hr * mmcf/100 lb * 1000 mmBtu/mmcf = 544.5 mmBtu/hr
544.5 mmBtu/hr * mmcf/0.00105 mmBtu = 518,571 mmcf/hr(rounded to the nearest whole number)
If 124.16 gal/hr diesel/jet fuel = 238.47 TPY NOx &
518,571 mmcf/hr natural gas = 238.47 TPY NOx, then
518,571 mmcf/hr * hr/124.16 gal = 4176 mmcf natural gas per 1 gallon diesel/jet fuel

Emission factors were derived from the tables located in AP-42 and are located as follows:
Table 3.4-1 SCC 2-02-004-01,3.3-2 SCC 2-02-001-02 & SCC 2-03-001-01, & 1.4-2 SCC 1-02-006-02

State Rule Applicability - Storage Vessels

Since this source is a petroleum source located in Marion County, 326 IAC 8-4-1 is applicable. The following sections were considered, for requirements affecting EU08, EU09, and EU10, under this rule:
Section 2: This was a new source after January 1, 1980. However, it is not a petroleum refinery
Section 3: This was a new source after January 1, 1980 and there are petroleum liquid storage facilities located at the source. However, only the two (2) jet fuel storage tanks, identified as EU08 have a capacity greater than 39,000 gallons but, Jet A fuel does not have a true vapor pressure greater than 10.5 kPa.
Section 4: This was a new source after January 1, 1980. However, neither the source or facility fits the definition of "bulk gasoline terminal"
Section 5: This was a new source after January 1, 1980. However, neither the source or facility fits the definition of "bulk gasoline plant"
Section 6: The diesel/ jet fuel storage tank, identified as EU10 was installed after July 1, 1989 but it does not dispense "gasoline". EU08 and EU09 dispense gasoline at a rate greater than 10,000 gallons per month. However, both EU08 and EU09 were both in existence prior to July 1, 1989.
Section 7: This was a new source after January 1, 1980. However, this rule applies to bulk gasoline sources.

Maximum vapor pressure limit

The maximum true vapor pressure of the liquid shall be as follows:

(a) each of the two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, shall not exceed 3.5 kPa, and

(b) the 20,000 gallon diesel storage tank, identified as EU10, shall not exceed 15.0 kPa

These limits will assure compliance with the proper monitoring requirements specified in 40 CFR 60, Subpart Kb

State Rule Applicability - Insignificant Paint Booths

General Operation

Any change or modification which may increase potential emissions from either of the two (2) paint booths to the following (insignificant limits):

(a) three (3) pounds per hour or fifteen (15) pounds per day of VOC, and

(b) five (5) pounds per day or one (1) ton per year of a single HAP, and

(c) twelve and one half (12.5) pounds per day or two and one half (2.5) tons per year of any combination of HAPs,

shall obtain prior approval from the Environmental Resource Management Dision (ERMD) and Office of Air Management (OAM).

Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

State Rule Applicability - Insignificant Degreasers

326 IAC 8-3, section 2 through 4 apply to the following new facilities after January 1, 1980 performing organic solvent degreasing operations. 326 IAC 8-3, sections 5 through 7 apply to facilities located in Marion County prior to July 1,1990 or any county, if installed after that date. Therefore 326 IAC 8-3-1 through 326 IAC 8-3-7 are applicable to the degreasing facility. However only 326 IAC 8-3-2 and 326 IAC 8-3-5 have applicable requirements to the cold cleaner degreaser operation.

Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Diesel /jet fuel generators, engines & natural gas fired boilers have applicable Compliance Monitoring Conditions as listed below:

(a) Visible emission notations of the stack exhaust, when burning diesel or Jet A fuel, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, ie. pages 1 through 11)

Conclusion

The operation of this stationary air courier service shall be subject to the conditions of the attached proposed **Part 70 Permit No. T097-11253-00257.**

POLLUTANT	emission unit	btu	hp
pm	eu01	63.6	63.6
	eu02	0.1	0.1
	eu03	0.1	0.1
	eu04	0.1	0.1
	eu05	2.55	2.58
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	eu06	0.5	0.5
	insig ng	0.2	0.2
Total pm		**67.35**	**67.38**
pm10	eu01	36.4	
	eu02	0.1	
	eu03	0.1	
	eu04	0.1	
	eu05	2.55	2.58
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	eu06	2.1	2.1
	insig ng	0.6	0.6
toal pm10		**42.15**	
so2	eu01	321.2	367.5
	eu02	0.7	0.8
	eu03	0.7	0.8
	eu04	0.6	0.7
	eu05	2.39	2.41
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	insig d/jf	0.04	0.04
	eu06	0.2	0.2
	insig ng	0.1	0.1
total so2		**326.09**	**372.71**
NOx	eu01	2035.3	2180.6
	eu02	4.5	4.8
	eu03	4.5	4.8
	eu04	3.8	4
	eu05	36.31	36.42
	insig d/jf	0.6	0.6
	insig d/jf	0.6	0.6
	insig d/jf	0.6	0.6
	insig d/jf	0.6	0.6
	insig d/jf	0.6	0.6
	eu06	27.5	27.5
	insig ng	8.5	8.5
total nox		**2123.41**	**2269.62**
voc	eu01	57.2	64.1
	eu02	0.1	0.1
	eu03	0.1	0.1
	eu04	0.1	0.1
	eu05	2.96	2.95
	insig d/jf	0.05	0.05
	insig d/jf	0.05	0.05
	insig d/jf	0.05	0.05
	insig d/jf	0.05	0.05
	insig d/jf	0.05	0.05
	eu06	1.5	1.5
	insig ng	0.5	0.5
total voc		**62.71**	**69.6**
co	eu01	540.6	499.7
	eu02	1.2	1.1
	eu03	1.2	1.1
	eu04	1	0.9
	eu05	7.82	7.85
	insig d/jf	0.13	0.13
	insig d/jf	0.13	0.13
	insig d/jf	0.13	0.13
	insig d/jf	0.13	0.13
	insig d/jf	0.13	0.13
	eu06	23.1	23.1
	insig ng	7.1	7.1
total co		**582.67**	**541.5**

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)
EU01 = 8 generators = 2593hp ea or 18.15mmBtu ea

Company Name: Federal Express Corporation
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity MM Btu/hr: 145.2

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.0573	0.5 *(1.01S)*	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	63.6	36.4	321.2	2035.3	57.2	540.6

254 t/y ea

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp): 20744.0

Potential Throughput hp-hr/yr: 181717440.0

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.0040 *(.00809S)*	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	63.6	0.0	367.5	2180.6	64.1	499.7

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Througput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)
EU01 = 8 generators = 2593hp ea

Fuel/NOx Emission Limit Calculation

Company Name: Federal Express Corporation
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity MM Btu/yr: 17.01

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.0573	0.5 *(1.01S)*	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	7.5	4.3	37.6	238.41	6.7	63.3

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp): 2052.86

Potential Throughput hp-hr/yr: 17983053.6

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.0040 *(.00809S)*	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	6.3	0.0	36.4	215.8	6.3	49.5

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Througput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)
Emergency Generators
EU02 and EU03 each = 600kW * 1.341hp/kW = 804hp

Company Name: Federal Express Corporation
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity MM Btu/hr: 5.63

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.0573	0.5 *(1.01S)*	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.1	0.1	0.7	4.5	0.1	1.2

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp): 804.6

Potential Throughput hp-hr/yr: 402300.0

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.0040 *(.00809S)*	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.1	0.0	0.8	4.8	0.1	1.1

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Througput (hp-hr/yr) = hp * 500 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

updated 4/99

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)
Emergency Generator
EU04 = 500kW * 1.341hp/kW = 670.5hp

Company Name: Federal Express Corporation
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity MM Btu/hr: 4.69

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.0573	0.5 *(1.01S)*	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.1	0.1	0.6	3.8	0.1	1.0

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp): 670.5

Potential Throughput hp-hr/yr: 335250.0

S= 0.5 = WEIGHT % SULFUR

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.0040 *(.00809S)*	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.1	0.0	0.7	4.0	0.1	0.9

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Througput (hp-hr/yr) = hp * 500 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] *500 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

updated 4/99

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating

EU05 = 200kW * 1.341hp/kW = 268.2hp

Company Name: Federal Express
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

1.88

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	2.55	2.55	2.39	36.31	2.96	7.82

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp)	Potential Throughput hp-hr/yr
268.2	2349432.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	2.58	2.58	2.41	36.42	2.95	7.85

Methodology

Potential Througput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating
Insignificant Engines

Fuel/NOx Emission Limit Calculation

Company Name: Federal Express
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

0.0313

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	0.04	0.04	0.04	0.605 x 5	0.05	0.13

insignificant diesel fired engines
= 3.025

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable. icdsl250.wk4 9/95
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included). updated 4/99

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
EU06 = two 31.385mmBtu/hr boilers
Company Name: Federal Express Corporation
Address, City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
62.8	549.9

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.5	2.1	0.2	27.5	1.5	23.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.774E-04	3.299E-04	2.062E-02	4.949E-01	9.348E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.375E-04	3.024E-04	3.849E-04	1.045E-04	5.774E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Small Industrial Boiler
Insignificant boilers
Company Name: Federal Express Corporation
Address, City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
TV Permit #: T097-11253-00257
Reviewer: Monica Dick
Date: 07/29/99

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
19.0	170.0

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.6	0.1	8.5	0.5	7.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
gasc99.wk4 9/95
See page 2 for HAPs emissions calculations.
updated 4/99

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.774E-04	3.299E-04	2.062E-02	4.949E-01	9.348E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.375E-04	3.024E-04	3.849E-04	1.045E-04	5.774E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Federal Express Corporation
Address City IN Zip: 3502 South High School Road, Indianapolis, Indiana 46251
Tv: T097-11253-00257
Reviewer: Monica Dick
Date: 7/6/99

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Number of Gallons per hour (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
EU-001	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
anti-cafe	9.33	100.00%	0.0%	100.0%	0.0%	32.00%	0.01700	9.33	9.33	0.16	3.81	0.69	0.00	29.16	0%
SD Polyurethane	7.42	100.00%	0.0%	100.0%	0.0%	24.30%	0.01700	7.42	7.42	0.13	3.03	0.55	0.00	30.53	0%
hardner	8.85	100.00%	0.0%	100.0%	0.0%	97.80%	0.01700	8.85	8.85	0.15	3.61	0.66	0.00	9.05	0%
fuel res. coating		100.00%	0.0%	100.0%	0.0%	0.00%	0.01700	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
B700 base	11.00	100.00%	0.0%	100.0%	0.0%	64.60%	0.01700	11.00	11.00	0.19	4.49	0.82	0.00	17.03	0%
activator	8.51	100.00%	0.0%	100.0%	0.0%	51.30%	0.01700	8.51	8.51	0.14	3.47	0.63	0.00	16.59	0%
anti-cafe	11.17	100.00%	0.0%	100.0%	0.0%	65.85%	0.01700	11.17	11.17	0.19	4.56	0.83	0.00	16.96	0%
		0.00%	0.0%	0.0%	0.0%	0.00%		0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%

State Potential Emissions **Add worst case coating to all solvents and catalysts = Mineral Spirits, Whiping Solvent, Thinner, Sealer =** **4.19**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used an catalysts

HAP Emission Calculations

Company Name: Federal Express Corportion
Plant Location: 3502 South High School Road, Indianapolis, Indiana 46251
County: Marion
Permit Reviewer: Monica Dick
Date: 8/16/99

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Butyl Acetate	Weight % MIBK	Weight % MAK	Weight % Toluene	Weight % tanium Dioxic	Weight % xylene		Butyl Acetate	MIBK	MAK (ton/yr)	Toluene (ton/yr)	Titanium Dioxide (ton/yr)	xylene (ton/yr)	(ton/yr)
EU07																	
anti-chafe CTG	9.33	0.017000	1.00	5.00%	5.00%	5.00%	1.00%	20.00%	0.00%	0.00%	0.03	0.03	0.03	0.01	0.14	0.00	0.00
SD Polyurethane	7.42	0.017000	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.03	0.00	0.00	0.03	0.00
hardner	8.85	0.017000	1.00	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.11	0.00	0.00	0.00	0.00	0.11	0.00
fuel res. coating		0.017000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B700 base	11	0.017000	1.00	0.00%	5.00%	10.00%	1.00%	30.00%	5.00%	0.00%	0.00	0.04	0.08	0.01	0.25	0.04	0.00
activator	8.51	0.017000	1.00	15.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	0.10	0.00	0.00	0.00	0.00	0.00
anti-cafe	11.17	0.017000	1.00	0.00%	5.00%	10.00%	1.00%	30.00%	5.00%	0.00%	0.00	0.04	0.08	0.01	0.25	0.04	0.00
		0.017000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		0.017000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		0.017000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
											0.24	0.21	0.23	0.02	0.63	0.22	0.00

Total State Potential Emissions

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs